

### **REMARKS/ARGUMENTS**

The office action mailed February 21, 2006, has been carefully reviewed, and these remarks are responsive to that office action. Reconsideration and allowance of this application are respectfully requested.

Claims 1-14 were rejected under 35 U.S.C. 102(e) as anticipated by Flanagan et al. (U.S. Patent 6,993,471).

Claims 1-14 remain in this application. Claim 14 is currently amended.

Flanagan does not support a proper prima facie case of anticipation or obviousness of claim 1 because Flanagan does not disclose, teach, or suggest that "the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed" and Flanagan does not disclose, teach, or suggest, "at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user."

Claim 1 recites a computer-readable medium having computer-executable instructions for performing steps comprising: allowing a user to select a language in which at least a portion of an electronic file is to be displayed; receiving the electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed; at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user; and displaying to the user the second plurality of phrases that are expressed in the language selected by the user.

Flanagan discloses downloading an HTML document with content expressed in English and then using machine-translation software to translate the text into a user's native language. (Flanagan, col. 3, line 44, through col. 5, line 16). Flanagan discloses translating downloaded English documents into a different language. Flanagan does not disclose downloading

documents that contain words that are expressed in multiple spoken languages, such as English, French, Spanish, Italian, and the like. Flanagan does not, therefore, disclose, teach, or suggest that the HTML file's "content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed." Therefore, Flanagan also does not disclose, teach, or suggest, "at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user."

For at least the foregoing reasons, Flanagan, either alone or in combination with the other prior art of record, fails to establish prima facie anticipation or obviousness of the invention of claim 1.

Flanagan does not support a proper prima facie case of anticipation or obviousness of claim 6 because Flanagan does not disclose, teach, or suggest performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, and (2) inserting the translation obtained from the electronic file into a translated electronic file.

Claim 6 recites a method of providing an electronic file to a user comprising the steps of: assigning to at least one word in the electronic file a plurality of identifiers, wherein each identifier corresponds to one of a plurality of respective translations in the electronic file for said at least one word; and at a receiving computer: receiving the electronic file from a sending computer, allowing the user to select a language in which at least a portion of the electronic file is to be displayed, using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, inserting the translation obtained from the electronic file into a translated electronic file, and displaying the translated electronic file to the user.

Flanagan discloses downloading an HTML document with content expressed in English and then using machine-translation software to translate the text into a user's native language.

(Flanagan, col. 3, line 44, through col. 5, line 16). Flanagan discloses translating downloaded English documents into a different language. Flanagan does not disclose downloading documents that contain words that are expressed in multiple spoken languages, such as English, French, Spanish, Italian, and the like. Flanagan does not, therefore, disclose, teach, or suggest performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, and (2) inserting the translation obtained from the electronic file into a translated electronic file.

For at least the foregoing reasons, Flanagan, either alone or in combination with the other prior art of record, fails to establish prima facie anticipation or obviousness of the invention of claim 6.

Flanagan does not support a proper prima facie case of anticipation or obviousness of claim 14 because Flanagan does not disclose, teach, or suggest "assigning to a plurality of words in the document a plurality of identifiers, wherein each identifier corresponds to a respective one of a plurality of translations contained in the document for said plurality of words; and at a receiving computer: ... using an identifier from the plurality of identifiers to select a translation from the plurality of translations for said plurality of words, based upon the language selected by the user, [and] replacing the plurality of words in the document with the selected plurality of respective translations for the plurality of words."

Claim 14 recites a method of displaying at least a portion of a document in a language selected by a user, said method comprising the steps of: assigning to a plurality of words in the document a plurality of identifiers, wherein each identifier corresponds to a respective one of a plurality of translations contained in the document for said plurality of words; and at a receiving computer: receiving the document from a sending computer, allowing a user to select a language in which the document is to be displayed, using an identifier from the plurality of identifiers to select a translation from the plurality of translations for said plurality of words, based upon the language selected by the user, replacing the plurality of words in the document with the selected

plurality of respective translations for the plurality of words, and displaying the document to the user.

Flanagan discloses downloading an HTML document with content expressed in English and then using machine-translation software to translate the text into a user's native language. (Flanagan, col. 3, line 44, through col. 5, line 16). Flanagan discloses translating downloaded English documents into a different language. Flanagan does not disclose downloading documents that contain words that are expressed in multiple spoken languages, such as English, French, Spanish, Italian, and the like. Flanagan does not, therefore, disclose, teach, or suggest "assigning to a plurality of words in the document a plurality of identifiers, wherein each identifier corresponds to a respective one of a plurality of translations contained in the document for said plurality of words; and at a receiving computer: ... using an identifier from the plurality of identifiers to select a translation from the plurality of translations for said plurality of words, based upon the language selected by the user, [and] replacing the plurality of words in the document with the selected plurality of respective translations for the plurality of words."

For at least the foregoing reasons, Flanagan, either alone or in combination with the other prior art of record, fails to establish prima facie anticipation or obviousness of the invention of claim 14.

Claims 2-5 and 7-13 properly depend upon claims 1 and 6, respectively. Therefore, these dependent claims are in condition for allowance for at least the reasons discussed above in connection with claims 1 and 6.

### **CONCLUSION**

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicant respectfully submits that this application is in condition for allowance, and respectfully requests issuance of a notice of allowance.

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Amendment dated May 19, 2006  
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Respectfully submitted,

BANNER & WITCOFF, LTD.

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